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1 A. A printout is not required. They can certainly  
2 do a local or screen print of a request, and if it's over  
3 a certain number of pages, it will be automatically  
4 printed because of the size of the request. And those are  
5 generally associated with large hunt groups and PBX  
6 services, complex services.

7 MR. McDONALD: I don't think I have anything  
8 further.

9 MR. ETTINGER: Do you want to break?

10 MR. KOLTO-WININGER: Off the record.

11 (Discussion off the record.)

12

13 EXAMINATION BY MR. ETTINGER

14 MR. ETTINGER: Q. Good afternoon, Ms. Wood. I  
15 am Will Ettinger. I represent AT&T.

16 I want to turn to the time in 1995 when you were  
17 doing the initial planning for the LISC. I believe your  
18 testimony is that you were working with Mr. Torretta,  
19 Ms. Long and Mr. Hough primarily; is that correct?

20 A. Yes.

21 Q. Now, as far as those meetings are concerned, did  
22 you all report up to the same vice president at that time?

23 A. We all reported up to Liz Fetter.

24 Q. But below Liz Fetter, at that time, did you  
25 report to Mr. Sinn?

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1 A. No.

2 Q. Who did you report to?

3 A. I reported to Eileen Arbues at that time.

4 Q. And Ms. Long reported to Mr. Sinn, correct?

5 A. Yes.

6 Q. And Mr. Hough?

7 A. Mr. Hough reported to Jaime Villagomez.

8 Q. And that's in the finance group?

9 A. Yes.

10 Q. And Mr. Torretta?

11 A. Reported to Joan Brown.

12 Q. All those people you mentioned, Mr. Sinn,

13 Ms. Brown, Ms. Arbues and Mr. Villagomez, they all

14 reported to Liz Fetter?

15 A. Yes.

16 Q. At the time of those meetings, do you know to

17 what degree there was some coordination above your level

18 at the, say, the vice president level?

19 MR. KOLTO-WININGER: Objection. Vague. But go

20 ahead.

21 MR. ETTINGER: Q. If you know.

22 A. I really don't know the specifics.

23 Q. So you don't know whether they met with each

24 other?

25 A. Not offhand.

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1 Q. Did you receive any direction from your

2 supervisor, Ms. Arbues, at that time, as to what your

3 function should be in the planning for the LISC?

4 A. I primarily received my direction, in terms of

5 LISC planning, from Jerry Sinn, because Jerry was

6 responsible for the LISC, so Jerry would, essentially,  
7 come to me asking for my input from the process  
8 perspective on LISC plans.

9 Q. How often did Mr. Sinn come to you for advice  
10 or -- whatever he sought from you?

11 A. Once a month, once every two months, in the  
12 early stages in '95.

13 Q. You are talking about '95?

14 A. Yes.

15 Q. Subsequent to '95, when the LISC started in  
16 operation in 1996, you were still involved in the  
17 operations of the LISC and plans for improving the  
18 operations, correct?

19 A. In 1996?

20 Q. Yes.

21 A. Yes.

22 Q. And did your meetings continue, at that time,  
23 with the same individuals?

24 A. Yes, more or less, yes.

25 Q. And was the supervision pretty much the same, at  
0125 1 that time?

2 A. Yes.

3 Q. And would your answer be the same about input  
4 for your supervisor during that period of time that you  
5 supposedly received input from Mr. Sinn about planning for  
6 the LISC?

7 MR. KOLTO-WININGER: Objection. I think it

8 mischaracterizes the testimony with respect to supervisor.

9 But go ahead.

10 THE WITNESS: Jerry Sinn would make requests  
11 from me for input around LISC planning, so to the extent  
12 that I provided input around LISC planning, those requests  
13 generally came from Jerry and his management team.

14 My direct report supervisor at that time was  
15 Carol Spain, under Eileen Arbues, because earlier you  
16 asked about a vice presidential level which would be  
17 Eileen. And then Carol Spain reported to Eileen and I  
18 reported to Carol Spain. Does that clarify the --

19 MR. ETTINGER: Q. What I wanted to know is, did  
20 Mr. Sinn come to you directly or did he go through the  
21 chain of -- your direct chain of command?

22 A. He would generally come to me directly, but I  
23 always kept my chain of command in the loop in terms of  
24 advising him as to what I was doing, as a matter of  
25 course, for performance appraisals and that type of thing,  
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1 so --

2 Q. So it wasn't a case of Mr. Sinn going to  
3 Ms. Arbues and saying -- ask Ms. Woods to do such and  
4 such. He came to you directly?

5 MR. KOLTO-WININGER: You mean as a general  
6 party?

7 MR. ETTINGER: Q. In regard to matters  
8 regarding the LISC.

9 A. Yes.

10 Q. And then you would do these things and also let

11 your supervisors know what you were doing?

12 A. Correct.

13 Q. So there was a discussion that you had with

14 Mr. McDonald about the recommendation that you made for

15 approximately, I think you used the number 742,

16 recognizing that's an approximation, the need for 742

17 employees in the LISC. You made that recommendation

18 sometime in October or November of '96; is that correct?

19 A. Correct.

20 Q. And that recommendation was to meet that need by

21 year-end '96; is that correct?

22 A. Year-end '96, within first quarter '97.

23 Q. Do you know what the number of employees was in

24 the LISC by year-end '96?

25 A. Approximately, all told, 250 to 300,  
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1 approximately.

2 Q. Were those all employees or were some of those

3 temporaries?

4 A. I think the great majority of them were

5 employees, but we certainly had temporary or contract

6 personnel as well.

7 Q. Is it correct that this recommendation was

8 made -- was it made to Jerry Sinn in writing or just oral?

9 A. I did provide Jerry something in writing, but I

10 don't know if it was a memo or if it was simply a

11 worksheet of our calculations.

12 Q. Is it your testimony that you got no response

13 from Mr. Sinn regarding this estimate of the need for  
14 employees?

15 A. I got an acknowledgement, certainly, that he got  
16 the estimate, and there were probably some discussions  
17 about it, but it wasn't along the lines of a normal  
18 acknowledgement, that type of thing. It was a matter of  
19 me submitting the work that my team and I had done in  
20 estimating LISC resources and us having, as a team with  
21 Jerry and members of his management team, discussions  
22 about that estimate.

23 Q. So you got some acknowledgement that it was  
24 received?

25 A. Yes, and certainly questions about how we  
0128 1 derived that number and the assumptions that we used, et  
2 cetera.

3 Q. Did you get any response along the lines that  
4 Mr. Sinn or his group thought the number was either too  
5 high or too low or just right?

6 A. My sense is they felt it was probably in line  
7 with the forecast and the business processes and the  
8 mechanization, as we viewed them at that time.

9 Q. Now, you say in line with the forecast, I think  
10 Mr. McDonald asked you about Exhibit 14, which was dated  
11 August 30th, '96. It's also a forecast which has been  
12 previously marked as deposition Exhibit 15, dated 11/6/96.  
13 I am going to show it to you. And I recognize that you  
14 said you haven't seen forecasts in this exact format  
15 before.

16 I will just ask you to take a look at the  
17 totals, without reading them into the record, and ask you,  
18 to the best of your recollection, are these the forecast  
19 numbers that you saw in the November '96 time frame?

20 MR. KOLTO-WININGER: Are you asking exactly,  
21 ballpark, or do you care one way or the other?

22 MR. ETTINGER: I am asking to the best of her  
23 recollection, and maybe we can fine-tune it, depending on  
24 what she says.

25 THE WITNESS: Yeah, essentially -- the forecast  
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1 information that I saw or have seen, as I indicated  
2 before, didn't necessarily include this product mix. I  
3 mean, certainly ACM was not included, some of the more  
4 complex services.

5 And it seems to me that the forecasts that I saw  
6 went through 1996, and, you know, there are indications on  
7 here, obviously, that we had no volumes in April, May and  
8 June of '96. So it's very likely that I saw an earlier, a  
9 much earlier version of the forecast before reality began  
10 to set in, in terms of what was actually coming into the  
11 LISC.

12 MR. ETTINGER: Q. I guess I am asking you, did  
13 you see a forecast in the November time frame?

14 A. Of 1996?

15 Q. Of '96, volumes through year-end '96, and  
16 actually, I will let you look at the second page. It goes  
17 on into '97, just so you are clear.

18 A. I would have to say that the majority of the  
19 forecasts that I looked at were in late '95 and early '96,  
20 and reflected a 1996 spread of volumes from January  
21 through end-of-year, essentially, for '96 and into the  
22 first part of '97, first quarter of '97. So to the extent  
23 that this represents first quarter of '97, you know, that  
24 looks about right. I could not attest to the numbers.

25 Q. So you don't remember --  
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1 A. Presumably.

2 Q. -- if the numbers shown on Exhibit 15 are the  
3 numbers you saw at that time?

4 A. No, I really don't.

5 Q. Do you remember if you saw any forecast in the  
6 October or November time frame?

7 A. I don't know if it was precisely in the October,  
8 November time frame, I know that I have reviewed forecasts  
9 during 1996, and that we made staffing estimates in 1996,  
10 based on the forecast information that we had at that  
11 time. It's very difficult to pinpoint the exact dates and  
12 the exact numbers.

13 Q. Once you gave the estimate of staffing  
14 requirements to Mr. Sinn, you later became aware, did you  
15 not, that Pacific did not step up to that number?

16 A. Could you repeat that?

17 Q. Did you later become aware, after you gave a  
18 for -- not the forecast, but the recommendation of the  
19 number of employees needed for the LISC, after you gave  
20 that to Mr. Sinn, did you later become aware that Pacific



21 Bell did not staff the LISC up to that estimate?

22 A. It's -- I knew that the current staffing of the  
23 LISC and the estimate that we gave did not match, and  
24 there was a considerable gap between the two. I also  
25 recognized that it's not possible to bring on that many  
0131  
1 people in that short time frame.

2 Q. Did you ask anybody, either Mr. Sinn or  
3 Mr. Stankey, or anybody else, as to why the LISC wasn't  
4 staffed up to your estimate?

5 MR. KOLTO-WININGER: Objection.  
6 Mischaracterizes the witness' testimony, but go ahead and  
7 answer.

8 MR. ETTINGER: I don't think I did characterize  
9 her testimony, but --

10 THE WITNESS: I knew of the issues associated  
11 with bringing on that level of staffing, so I didn't feel  
12 compelled to ask them why they had not staffed up to my  
13 recommendation. My recommendation, or my estimate,  
14 rather, was given in late 1996, based on forecasting  
15 information and the realities of what was coming into the  
16 LISC. And knowing how difficult it is to bring on that  
17 level of resources, I never felt compelled to ask them  
18 why.

19 I knew that there were plans to ramp-up the LISC  
20 resources to much higher levels than currently existed. I  
21 knew of the plans associated with the Tustin and  
22 Sacramento offices, my staff was involved in training for

23 those offices. I knew of the Tustin plans during the  
24 first quarter of '97 for the Anaheim office, so I was  
25 aware of what was going on in terms of bringing in  
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1 additional resources, training them.

2       You know, I was getting pressure on my resources  
3 to help with that training, help with the M&P development,  
4 et cetera, so I guess the bottom line is, I never felt  
5 there was a need to ask why.

6       MR. ETTINGER: Q. Did you ever discuss with any  
7 of your peers, or other people who you worked with,  
8 Pacific's failure to staff up to your recommended number  
9 of employees?

10       MR. KOLTO-WININGER: Same objection.  
11 mischaracterizes the witness' testimony; assumes facts not  
12 in evidence.

13       THE WITNESS: We certainly discussed the  
14 difficulties associated with, again, bringing on that  
15 level of staffing and the resource difficulties that we  
16 were having in both Northern and Southern California, in  
17 terms of finding qualified personnel, the training issues.  
18 Training that number of people is difficult. And we  
19 discussed things along those lines, because that's the  
20 area of the business that my team and myself and the LISC  
21 management is involved in.

22       MR. ETTINGER: Q. These discussions you just  
23 referenced, who were they with?

24       A. They would be with members of my staff, Ann  
25 Long, members of Don Griffin's staff, the training staff,

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1 and most recently with my boss, with John Stankey.

2 Q. When did these discussions take place, over what  
3 period of time?

4 A. I'd say they started in November and have  
5 continued to date.

6 Q. Has anyone ever indicated to you that there was  
7 insufficient budget to staff LISC up to your  
8 recommendation?

9 A. No.

10 Q. Has anyone ever indicated to you that your  
11 recommendation for the number of employees was too high  
12 vis-a-vis the need for the LISC to handle capacity?

13 A. I was asked to, essentially, provide my  
14 assumptions and thinking behind the resource  
15 recommendation or staffing recommendation, but otherwise,  
16 no.

17 Q. Did anyone ever indicate to you that the number  
18 of estimated employees was too high because future systems  
19 enhancements would make the need for that many employees  
20 unnecessary?

21 A. No.

22 Q. Let me ask you a hypothetical question. Let's  
23 hypothetically -- let me ask you a hypothetical question.  
24 Let's assume that the LISC had been staffed at that period  
25 of time with 700 people, and let's further assume that the  
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1 system upgrades that you have discussed, which have taken  
2 place in '97 so far, through the end of May '97, all take

3 place, if implemented as planned, were that 750 or 742

4 number of employees then become too high?

5 A. No.

6 Q. At one point during this morning's testimony, in  
7 answer to a question that Mr. McDonald -- as to backlogs  
8 at the LISC, he asked you why you believed those backlogs  
9 had occurred, and my recollection of your testimony, and  
10 you can correct me if I'm wrong, was that in December of  
11 '96, the LISC was hit with unexpectedly high volume. Do  
12 you recall that?

13 A. Yes, I recall that.

14 Q. When you say unexpectedly high, do you mean  
15 higher than had been forecast?

16 A. Not necessarily higher than had been forecast,  
17 but you have to remember that we were not getting forecast  
18 information from the customers. We were largely  
19 forecasting, based on internal intelligence about how we  
20 thought the resale and unbundled network element market  
21 might go.

22 So the -- and the reality was that we had not  
23 received the volumes that we had forecasted, so that when  
24 the LISC got hit in late year '96 -- first of all, it was  
25 not the type of slow, kind of steady ramp-up that we had  
0135  
1 expected. It was more of a spike, and it was in contrast  
2 to the levels, the volumes that we had seen in previous  
3 months.

4 Q. So do I understand your testimony to be that the  
5 LISC, in late '96, was not at capacity to handle the

6 volume that was internally forecasted by Pacific?

7 A. That's correct.

8 Q. And the volumes that were actually received by  
9 Pacific in late '96 -- let's take it a month at a time.

10 Let's take December of '96. Were they higher or  
11 lower, if you know, than the internal forecast at Pacific?

12 A. Offhand, I really don't know. They were more of  
13 a manual nature than we had expected, because the carriers  
14 that we were receiving these high volumes from were not on  
15 the mechanized interface. So we were getting more manual  
16 requests faxed and Federal Expressed and mail requests  
17 than we had expected to receive.

18 Q. How about in January of '97, do you know if the  
19 actual volume that the LISC -- of orders into the LISC was  
20 higher or lower than the forecast?

21 A. I honestly don't know.

22 Q. I am going to show you -- you don't know because  
23 you don't know the volume of orders that were -- that came  
24 into the LISC, or you don't know what the -- or don't

25 remember what the forecast was?

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1 A. Both.

2 Q. Would it refresh your recollection if I show you  
3 Pacific's internal forecasts for those months?

4 A. Well, it won't help with the actuals, because I  
5 don't know what the actuals are offhand.

6 Q. If I show you the forecasts for January,  
7 February and March of '97, would you be able to tell me

8 whether the LISC would have been able to handle that  
9 volume, without revealing the number?

10 A. No, I don't believe that I would be able to give  
11 you an accurate reflection of that.

12 Q. Do you continue to receive forecasts numbers?

13 A. Not on a regular basis, only if I request the  
14 information.

15 Q. When was the last time you requested that  
16 information?

17 A. Probably January, February time frame. I  
18 requested it in association with some work I was doing on  
19 mechanization.

20 Q. Who did you request it from?

21 A. Robert Hough.

22 Q. Just so I am clear, he provided you with some  
23 forecast numbers that were in a format different than  
24 Exhibit 15?

25 A. I don't know if the numbers were different  
0137  
1 offhand, but --

2 Q. I am only asking about the format.

3 A. The format was in a standard Excel spreadsheet.

4 MR. ETTINGER: Will you stipulate with me,  
5 Mr. Kolto-Wininger, that Exhibit 15 was the forecast that  
6 was an official Pacific Bell forecast that was in effect  
7 in the January time frame?

8 MR. KOLTO-WININGER: I will stipulate with you  
9 that that's what Laura Schwartz testified to. I can't  
10 stipulate from personal knowledge.

11 MR. ETTINGER: That's all I ask.

12 MR. KOLTO-WININGER: Sure.

13 THE WITNESS: Can I correct something, my  
14 previous statement?

15 MR. ETTINGER: Q. Sure.

16 A. I was thinking about the work I was doing on the  
17 systems. I got forecast information in early March '97.

18 That was the last time.

19 Q. Are you changing the January date to March or  
20 are you adding that date?

21 A. No, I am changing the January date to March.

22 Q. You did not get it in January?

23 A. Correct.

24 Q. You did get it in March?

25 A. Correct.

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1 Q. I am going to show you Exhibit -- what's been  
2 previously marked, and this is not proprietary, as I  
3 recall, Exhibit 7, which is the LISC capacity, and I will  
4 ask you to just take a look.

5 First off, have you ever seen either this  
6 document or the numbers contained in the document?

7 A. No.

8 Q. I will ask you to take a moment to familiarize  
9 yourself with the document.

10 MR. McDONALD: Just for the -- that's Exhibit 7?

11 MR. ETTINGER: Exhibit 7, and that, by  
12 agreement, is no longer considered proprietary.

13 THE WITNESS: Okay.

14 MR. ETTINGER: Q. I am going to ask you about  
15 the capacity in orders per day that's estimated here by  
16 Exhibit 7.

17 Exhibit 7 estimates that the resale LISC can  
18 handle between 2,000 -- will be able to handle between  
19 2,000 and 2,500 orders per day by the end of the second  
20 quarter 1997. Do you see that?

21 A. Yes.

22 Q. Do you have any independent knowledge of that  
23 number, whether that's correct or not?

24 A. Could you clarify what you mean by independent  
25 knowledge?  
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1 Q. Maybe I should step back. Were you asked by  
2 anyone to help prepare this document?

3 A. No.

4 Q. Were you asked by anyone to help prepare an  
5 estimate of what the LISC capacity would be through the  
6 end of 1997, and by the LISC capacity, I am talking about  
7 the resale LISC?

8 A. No.

9 Q. I am going to ask you to assume for the moment  
10 that these are Pacific Bell's best estimates of LISC  
11 capacity through the end of 1997. Do you have any  
12 estimate of how many employees it would be necessary to  
13 have in the LISC, in order to meet each of these  
14 milestones, second quarter, third quarter and fourth  
15 quarter, as shown in Exhibit 7?



16 A. No.

17 Q. I believe your testimony was, after you made  
18 your staffing recommendation in late '96, you were  
19 never -- since that time, never made another staffing  
20 recommendation; is that your testimony?

21 A. Correct.

22 Q. Is that because your job changed and somebody  
23 else is responsible for doing that?

24 A. No. My job did not change. John has  
25 subsequently brought in additional personnel because of  
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1 the need or burden on my staff to pick up some of those  
2 functions.

3 Q. Just so the record is clear, John, you are  
4 referring to John Stankey?

5 A. Stankey, yes.

6 Q. And so somebody else now -- or is there  
7 somebody, to your knowledge, who is responsible for making  
8 staffing recommendations as to the number of employees  
9 needed in the LISC?

10 A. I believe that John Stankey has been working  
11 those issues directly with Don Griffin, who is the  
12 director of the LISC, and Don's management team.

13 Q. So to the best of your knowledge, Don Griffin  
14 and his management team make written recommendations to  
15 Mr. Stankey as to how many employees are required in the  
16 LISC between now and end of the year?

17 A. To the best of my knowledge.

18 Q. Do you know what those recommendations are?

19 A. No.

20 Q. And it's not necessary for you to know how many  
21 employees are planned to be in the LISC in order to write  
22 procedures?

23 A. No.

24 Q. Is there a critical size that the LISC must be  
25 over in order for certain procedures to be effective? Do  
0141  
1 you understand my question?

2 A. No, I don't think I am entirely clear.

3 Q. Maybe I should rephrase it.

4 A. Yeah.

5 Q. Maybe I will start with a hypothetical.

6 Your profession, is it not, is to -- because of  
7 your familiarity with how Pacific Bell operates, both its  
8 systems, how its employees are trained, your job, as I  
9 understand it, is to write procedures for the processes  
10 that are necessary to take place in order to be -- for the  
11 appropriate interfaces between humans and computers, and  
12 humans from one department and humans in another  
13 department, and humans in one company and humans in  
14 another company. Does that kind of fairly summarize what  
15 you do?

16 A. Yes, it's a fair summary.

17 Q. And the human beings that you are writing  
18 processes for are the human beings in the LISC?

19 A. Correct.

20 Q. If we were to make an analysis, Mr. Torretta is

21 writing processes for computers that serve the LISC?

22 A. Yes.

23 Q. I know it's not a one-to-one, but --

24 A. Yeah.

25 Q. If you are dealing -- if there are only,  
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1 hypothetically only, say, five people -- and maybe we

2 shouldn't even call it the LISC, let's just call it a

3 hypothetical and call it the ABC group -- had to do

4 certain work, and they had a variety of tasks, it would be

5 harder to specialize than if there were 5,000 people in

6 the ABC group, wouldn't it?

7 A. Well, I mean, you can specialize almost anything

8 if you have the appropriate Methods and Procedures and

9 training associated with those Methods and Procedures, in

10 that, for those people that are performing those

11 functions, it's not a specialty, it's a part of their job.

12 Q. I am going to ask the question this way.

13 A. Yeah.

14 Q. If you have five people and there are ten tasks

15 that have to be accomplished, assume no absenteeism for

16 the moment, then each person, just as a matter of

17 mathematics, must know at least two tasks; doesn't that

18 follow?

19 MR. KOLTO-WININGER: Incomplete hypothetical.

20 Go ahead.

21 THE WITNESS: Not necessarily, not if all five

22 people are required to perform all ten tasks.

23 MR. ETTINGER: Q. That's my question. They  
24 have to -- the minimum number of tasks that anybody would  
25 have to know how to do is two; is that true?

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1 A. Given the hypothetical, yes.

2 Q. If I leave the number of tasks the same and  
3 expand the number of people to ten, then the minimum  
4 number of tasks that they would have to do is one?

5 A. I guess I don't make a direct relationship  
6 between the tasks and the number of people. The tasks  
7 within a business process either have to be performed by  
8 the people or they have to be performed in some other way,  
9 as by a system, or they can be eliminated as unnecessary  
10 to the successful completion of the business process.

11 Q. Let me ask the question, not as a hypothetical.  
12 As the LISC has expanded in size -- by size, I mean has  
13 more employees -- have the employees become more  
14 specialized?

15 MR. KOLTO-WININGER: Don't speculate, but if you  
16 know, answer.

17 THE WITNESS: No, I don't believe that they  
18 have. I believe that the original version of the LISC, in  
19 terms of the process flow within the LISC, included some  
20 specialty, in terms of order processing versus FOC versus  
21 completion. They have moved to having the service reps  
22 and order writers perform more of a critical to grave --  
23 or take more of a critical to grave approach with respect  
24 to the business process.

25 In other words, the rep who does the -- who

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1 receives the assigned request from the CLC, processes the  
2 service orders, does the FOC, performs most, if not all,  
3 of the functions associated with that request. So to that  
4 extent, I would say that there's less specialization, in  
5 terms of those functions or tasks, than there were  
6 previously.

7 MR. ETTINGER: Q. In writing procedures for the  
8 LISC, are you finding that your writing procedures tend to  
9 specialize employees more?

10 A. No. We write procedures to functions, not to  
11 positions within the service center. So in other words,  
12 we write out, this is the procedure for order issuance,  
13 this is the procedure for Firm Order Confirmations, or  
14 FOC's. We don't define who performs those functions or  
15 whether they are performed by one person or multiple  
16 people. We focus on the tasks and subtasks associated  
17 with the function and then the process.

18 Q. Who makes the determination as to whether or not  
19 to have everybody trained to and able to perform all the  
20 tasks or to take the tasks and have them specialized?

21 A. The LISC management team.

22 Q. That would be Don Griffin?

23 A. Yes.

24 Q. Did you assist, in any way, in the preparation  
25 of Pacific Bell's responses to MCI's first set of data  
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1 requests in this case?

2 A. Yes.

3 Q. Do you know which questions you were involved  
4 with, or were you just asked to -- let me stop right  
5 there.

6 Do you know which questions you were involved  
7 with?

8 MR. KOLTO-WININGER: By number?

9 MR. ETTINGER: Yes, by number.

10 THE WITNESS: No, I don't.

11 MR. KOLTO-WININGER: Which one of the 77?

12 MR. ETTINGER: Q. I am going to show you  
13 Pacific's response to MCI data requests number -- the  
14 Pacific Bell requests, which has been marked previously as  
15 Exhibit 8.

16 I am going to show you response number 114. The  
17 question and answer. Why don't you look it over and see  
18 if you remember that one.

19 A. No, I did not provide input to this one.

20 Q. Do you know who did?

21 MR. KOLTO-WININGER: Don't guess, but if you  
22 know.

23 THE WITNESS: No, I don't know.

24 MR. ETTINGER: Q. Do you have any feel for or  
25 opinion as to the pro -- whether the productivity of staff  
0146

1 in the LISC in the November, December time frame was at  
2 the level that had been expected?

3 A. No, not really.

4 Q. Were you ever asked in that time frame to-- let  
5 me rephrase that and ask you about any time frame.

6 Have you ever been asked to look at the  
7 operations of the LISC and compare what's actually being  
8 done in the LISC to the procedures that you have written,  
9 to see if there's been -- to see if there is any deviation  
10 practiced in the LISC from the procedures that you've  
11 read?

12 A. Yes.

13 Q. You have?

14 A. Yes.

15 Q. How many times have you done that?

16 A. That's pretty much an ongoing function of my  
17 staff, to maintain Methods and Procedures and, as such, to  
18 look at what the LISC is currently doing in light of those  
19 Methods and Procedures and make the necessary adjustments,  
20 if any, either to the M&P or to what the LISC is doing.

21 Q. Let's take this one at a time. Have you ever  
22 found instances where the LISC is not following the  
23 procedure that was written by you or your staff?

24 A. Yes.

25 Q. How many occasions have you found that?  
0147

1 A. I couldn't quote you a number.

2 Q. A large number?

3 A. No, no. I don't believe it's a large number.

4 They largely rely on the M&P to tell them how to conduct  
5 their business.

6 Q. Let's focus on instances where you found that  
7 they weren't following the M&P.

8 A. All right.

9 Q. In some instances -- well, in any of those  
10 instances, did you then go back and look and say, you  
11 know, they have a point, maybe we should change the M&P;  
12 it makes more sense what they are doing?

13 A. Yes.

14 Q. Is that a majority -- in percentage of the types  
15 that you found that quote, unquote, deviations, is that  
16 the majority of the time that you found deviations, that  
17 you changed the procedure, or minority?

18 A. Minority.

19 Q. What happened the other times that you found  
20 quote, unquote, deviations; did you go back to the LISC  
21 and say you need to have tighter control on your people  
22 because they are not following the procedures?

23 A. Largely, it would become a training issue.

24 Generally speaking, if there is a deviation between what  
25 the LISC is doing and what the M&P reflects, it's a matter  
0148

1 of training or coverage with the service reps and order  
2 writers in the LISC.

3 Q. So as I understand your testimony then, there's  
4 two things so far that we've covered that can happen when  
5 you find a deviation. One is you can change the M&P,  
6 because you find that somebody in practice has found a  
7 better -- quote, better, way to do it, right?

8 A. Sure.

9 Q. And the second thing is you go back, you look at  
10 the M&P, and you say no, the M&P is better than what we



11 are doing, they need to be trained, they need additional

12 training, they are not doing it right?

13 A. Right.

14 Q. Any other type of action that you would take if

15 you found a quote, deviation, unquote?

16 A. No, I think those two situations pretty much

17 cover --

18 Q. Let's look at the training aspect first. Do you

19 go back and check and see whether this is actually covered

20 in the training, or do you -- are there cases, I should

21 say, where there's been a deviation and you found that

22 they actually haven't been trained properly?

23 A. Not that I can recall offhand.

24 Q. So it's not missing from -- you haven't found a

25 case where the procedure was actually -- that you wrote  
0149

1 was missing from the training?

2 A. No.

3 Q. It's more a question of individuals, for

4 whatever reason, somehow it didn't sink in during the

5 training?

6 A. Either didn't sink in or the procedure changed

7 after they came out of training, and they either were

8 covered, because they were absent on the day, that the

9 supervisor covered them, on the change in procedure. Or

10 they just didn't pick it up, you know, it was something

11 relatively minor and they didn't pick it up. I mean,

12 there could be any number of reasons that get back, again,